

FILED
HARRISBURG, PA

JUL 28 2025

JRM

PER _____
DEPUTY CLERK

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

MARYANN BUTLER and AUDURY PETIE DAVIS,

Plaintiffs,

v.

NEW AMERICAN FUNDING,

Defendant.

Civil Action No. 1:25-cv-00690

**JUDICIAL NOTICE OF PUBLIC DISCLOSURES, PHRC COORDINATION, AND
TRANSPARENCY PRESERVATION**

NOW COME the Plaintiffs, by way of judicial notice, and hereby respectfully enter into the record the following:

1. Plaintiffs affirmatively preserve their right to publicize, document, and expose all underlying factual, regulatory, and judicial materials that form the basis of this action, including but not limited to:
 - Mortgage misconduct and third-party harm;
 - Off-record threats and procedural manipulation;
 - Verified exhibits, filings, and misconduct by counsel;
 - Regulatory correspondence, including PHRC intake and engagement.
2. This filing is submitted in anticipation of potential partial or full remand by the United States Court of Appeals for the Third Circuit, and as such, Plaintiffs expressly reject any retroactive attempt to seal, suppress, or sanitize filings reviewed by the appellate court or any attached public record.

3. Plaintiffs hereby notify this Court and any successor court or regulatory agency that public disclosures will be pursued in accordance with applicable rights under:
 - The First Amendment;
 - Pennsylvania Whistleblower and Civil Rights Laws;
 - All regulatory and media transparency statutes, including those allowing citizen exposure of misconduct affecting the public interest.
4. Plaintiffs reaffirm that they have ongoing coordination with the Pennsylvania Human Relations Commission (PHRC). A formal regulatory meeting is scheduled for September 2025, and all relevant judicial filings have been preserved for use during that proceeding.
5. Plaintiffs further state that regulator Katie Bielowski of the PHRC has shown responsiveness, and her awareness of the judicial docket including misconduct by attorneys and the underlying record is now part of the coordination strategy. This record is being referenced for the purpose of civil rights accountability and insurance exposure preservation.
6. This judicial notice stands as a transparent reservation of rights to proceed with lawful disclosures through:
 - Public regulators,
 - Media and third-party watchdogs,
 - Professional licensing boards,
 - And any relevant federal or state insurance oversight bodies.

CONCLUSION

This notice serves as a standing warning to all counsel of record, including newly substituted counsel, that any attempt to chill or suppress Plaintiff speech, filings, or public disclosures shall be met with immediate regulatory escalation and constitutional challenge. The record is the record.

Respectfully submitted,

/s/ Audury Petie Davis

Authorized Agent for Plaintiff Maryann Butler

Dated: July 28, 2025

Harrisburg, Pennsylvania

VERIFICATION

I, Audury Petie Davis, declare under penalty of perjury that the foregoing facts are true and correct to the best of my knowledge and belief.

/s/ Audury Petie Davis

Dated: July 28, 2025

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Judicial Notice was filed via PACER on July 28, 2025, thereby serving all registered counsel of record. As of this date, the identity of counsel for New American Funding remains ambiguous, including but not limited to:

- James McNally,
- John Q. Howard,
- Ronald A. Williams, Esq.,

and/or other members of Fox Rothschild LLP.

Service via PACER shall be deemed sufficient under the circumstances.

/s/ Audury Petie Davis

July 28, 2025